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BY ECF:
June 16, 2020

Honorable Sidney H. Stein
United States District Court Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Nicholas Falu,
19 Cr 795 (SHS)

Your Honor,

I am writing on behalf of the defendant, Nicholas Falu who as the Court is aware, has been released on bond under this Court's Order since November of 2019 under the following conditions:

- 1-\$150,000.00 PRB co-signed by three individuals
- 2- Home detention with GPS monitoring
- 3- Surrender of Passport
- 4- Drug testing
- 5- Travel only in the SDNY and EDNY.

Since his release from custody Mr. Falu has fulfilled all of his pre-trial release requirements including graduating from the Court's Focus Forward Program. Mr. Falu would most respectfully like to request that he be given permission this Sunday, June 21st between the hours of 1:00PM to 8:00PM to travel to his father's grave at Woodlawn Cemetery in the Bronx and join with his family for dinner at his brother's house located at 311 Street in the Bronx in honor of Father's Day. His Pre-trial officer Joshua Rothman and AUSA Balsamello have no objection to the graveside visit however Pre-Trial does object to allowing Mr. Falu to go to his brother's house for dinner afterward because as an office standard Pre-Trial does not consent to social leave requests because Pre-Trial believes they are not in line with the goals and intention of home detention. The prosecutor agreed with Pre-Trial's position. I would respectfully request that the Court allow Mr. Falu to not only visit his father's grave as agreed to by all parties but also attend the family dinner. It is after all

Honorable Sidney H. Stein

June 16, 2020

Page 2 of 2

Father's Day and this dinner is a family tradition in the Falu family. Mr. Falu has not requested any dispensation such as this in the past and does not foresee any further requests of this type in the future. It is just that this dinner is very important to his family. Mr. Falu has been a model defendant on bail and as stated has completed the Focus Forward Program, allowing him to attend one family dinner on Father's Day will not violate the spirit of home detention as Mr. Falu has been on home detention for over 6 months and will return to his home promptly after dinner.

Thus, I would respectfully request that the Court grant the above request. Thank you very much for your consideration of this matter

Respectfully yours,

David Touger

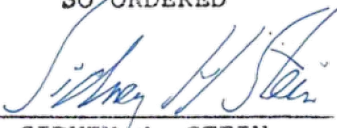
David Touger

cc: AUSA Frank Balsamello

Pre-Trial Services Officer Joshua Rothman

Application granted.

**Dated: New York, New York
June 16, 2020**

SO ORDERED


SIDNEY H. STEIN
U.S.D.J.